Limited Asbestos Survey Report



HEALTH & SAFETY • ENGINEERING • ENVIRONMENTAL

1553 West Todd Drive, Suite 201 ~ Tempe, AZ 85283 tel 480-460-8334 fax 480-460-8335 csceng.com

Presented To:

Barbara Wethington
Project Manager
Weston Solutions, Inc.
960 West Elliot Road, Suite 201
Tempe, Arizona 85284

Project:

Sun Chief Mill Site - Trailer Southeast Corner of Arizona Highway 77 & US 70 Globe, AZ

CSC Project # 5002357

Inspection Dates: January 26-27, 2010

Report Date: February 16, 2010

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ATTACHMENTS:

ASBESTOS LAB PLM BULK RESULTS & CHAIN OF CUSTODY AHERA BUILDING INSPECTOR CERTIFICATE



1. Project Summary

Project Name & Address: Limited Asbestos Survey

Sun Chief Mill Site - Trailer

Southeast Corner of Highways 70 & 77

Globe, AZ

CSC Project Number: 5002357

Client: Barbara Wethington, Project Manager

Weston Solutions, Inc.

960 West Elliot Road, Suite 201

Tempe, Arizona 85284 Phone: 480-477-4900

Email: b.wethington@WestonSolutions.com

On Site Contact: Steve Kleinheider, Site Manager

Weston Solutions, Inc.

960 West Elliot Road, Suite 201

Tempe, Arizona 85284

Consultant: Clark Seif Clark, Inc. (CSC)

1553 West Todd Drive - Suite 201

Tempe, Arizona 85283 Phone: 480-460-8334 Fax: 480-460-8335

Project Manager: Derrick A. Denis, CIAQP, CAC, CIEC

AHERA Building Inspector: Robert E. Crawley

AHERA Building Inspector # E2412, Expires April, 2010

Inspection and sampling date: January 26-27, 2010

Report date: February 16, 2010

2. Executive Summary

Barbara Wethington of Weston Solutions, Inc. retained Clark Seif Clark, Inc. (CSC) to perform a limited asbestos survey at the Sun Chief Mill Site located at the southeast corner of Arizona Highway 77 and US 70 near Globe, Arizona (referred to hereunder as the subject property). The survey was specific to the Trailer.

On January 26 and 27, 2010 CSC industrial hygiene consultant and AHERA Building Inspector, Robert Crawley (#E2412 expires April, 2010) performed a visual inspection and collected asbestos bulk samples of suspect asbestos containing building materials throughout the subject property that were readily accessible. A total of thirty (30) bulk asbestos samples of what appeared to be ten (10) homogeneous materials were collected at the subject property for PLM analysis.

The analytical results indicate that the following building materials **DO contain asbestos**:

- o Black Interior Penetration Mastic (kitchen); 5-7% chrysotile
- o White Exterior Window Putty; 2-3% chrysotile
- o Gray Exterior Window Putty; 30-35% chrysotile
- o Silver and White Exterior Paint; 10-12% chrysotile
- o Black Roofing Mastic (see note below)
 - Note: black roofing mastic appeared similar to the asbestos containing penetration mastic used to seal interior penetrations in the kitchen. While the three samples collected from the roof were non-detect for asbestos fibers, portions of the roof may contain asbestos containing black mastic. Furthermore, in most cases, the asbestos containing silver and white exterior paint is applied directly to the roofing mastic and is therefore inseparable. For these reasons, CSC considers the black roofing mastic an asbestos containing material.

The analytical results indicate that the following building materials do **NOT** contain asbestos:

- o Beige Vinyl Sheet Flooring w/ associated Yellow Mastic
- o White 1'x1' Vinyl Floor Tile w/ associated Beige Mastic
- o Fiberboard Ceiling w/ White Texture Coat
- White and Gold Wallpaper
- o Red (decorative) Brick w/ Black Mortar
- Roofing Layers

3. Asbestos Bulk Sampling Methodology

Asbestos bulk samples were collected and placed in zip-lock bags for laboratory analysis. This sampling was performed to identify asbestos in specific suspect asbestos containing materials (ACM). The samples were submitted for standard turn around time analysis via polarized light microscopy (PLM).



Limited Asbestos Survey Sun Chief Mill Site - Trailer Southeast Corner of Highways 70 & 77, Globe, AZ CSC Project Number 5002357

The PLM method is the most commonly used method to analyze building materials for the presence of asbestos. The PLM method is in accordance with the EPA Interim Method of the Determination of Asbestos in Bulk Samples (EPA, July 1993). This method utilizes the optical properties of minerals to identify the selected constituent. The use of this method enables identification of the type and the percentage of asbestos in a sample.

The detection limit of the PLM method for asbestos identification is approximately one percent (1%) asbestos. CSC recommends Transmission Electron Microscopy (TEM) or Point Counting analysis for asbestos samples with trace, or less than one percent (<1%) when analyzed via PLM.

In some cases, samples collected from an apparently homogeneous material and yielding mixed results may, in fact, have been taken from different homogeneous materials displaying similar visual characteristics but composed of different constituents. Although materials may appear to be homogeneous, different manufacturers may have produced them in different batches. Materials, which appear to be homogeneous but yield mixed results, are typically assumed, in accordance with AHERA procedures, to be asbestos containing in all areas where the materials are located.

4. PLM Asbestos Bulk Analysis Laboratory

Collected asbestos bulk samples were submitted under chain of custody for standard turn around PLM analysis to CSC laboratory in Chatsworth, California. CSC laboratory is NVLAP (#200324) accredited for bulk (PLM) asbestos analysis.

5. PLM Asbestos Bulk Sample Results

Positive samples identify building components as ACM. Asbestos containing materials are regulated materials. ACM scheduled for disturbance or in poor condition are subject to handling and disposal according to all local, state, and federal regulations.

On January 26-27, 2010, a total of thirty (30) bulk asbestos samples of what appeared to be ten (10) homogeneous materials were collected at the subject property for PLM analysis. Quantities of the asbestos containing material are estimations only.

The analytical results indicate that the following building materials **DO contain asbestos**:

- o Black Interior Penetration Mastic (kitchen); 5-7% chrysotile
 - ~3 square feet
- White Exterior Window Putty; 2-3% chrysotile
 - ~15 square feet
- o Gray Exterior Window Putty; 30-35% chrysotile
 - ~ 15 square feet
- o Silver and White Exterior Paint; 10-12% chrysotile
 - ~930 square feet



- o Black Roofing Mastic (see note below)
 - Note: black roofing mastic appeared similar to the asbestos containing penetration mastic used to seal interior penetrations in the kitchen. While the three samples collected from the roof were non-detect for asbestos fibers, portions of the roof may contain asbestos containing black mastic. Furthermore, in most cases, the asbestos containing silver and white exterior paint is applied directly to the roofing mastic and is therefore inseparable. For these reasons, CSC considers the black roofing mastic an asbestos containing material.

The analytical results indicate that the following building materials do **NOT** contain asbestos:

- o Beige Vinyl Sheet Flooring w/ associated Yellow Mastic
- O White 1'x1' Vinyl Floor Tile w/ associated Beige Mastic
- o Fiberboard Ceiling w/ White Texture Coat
- o White and Gold Wallpaper
- o Red (decorative) Brick w/ Black Mortar
- Roofing Layers

6. Conclusions

- 1. Interior Black Penetration Mastic (~ 3 square feet) located in the kitchen contained asbestos. The material is considered category II non-friable ACM.
- 2. White and Gray Exterior Window (and door) Putty contained asbestos. The material is considered category II non-friable ACM.
- 3. Silver and White Exterior Paint on the roof (applied over black mastic) contained asbestos. The material is considered category II non-friable ACM.
- 4. Category of asbestos may change due to the means employed by the contractor to remove ACM.

7. Recommendations

- 1. If suspect asbestos containing materials other than those tested are encountered, they must be assumed to contain asbestos or tested and proven otherwise.
- 2. Removal of category II non-friable ACM throughout the subject property should only be performed by certified asbestos abatement workers.
 - a. Removal by hand means shall be considered class 2 work.
 - b. Removal by mechanical means shall render the asbestos RACM.
 - c. Workers performing said work should comply with all state, local and federal regulations.
- 3. CSC should be contracted to write specifications prior to abatement and renovation activities at the subject property.
- 4. The contractor should be responsible for verifying locations and quantities of ACM.
- 5. A complete copy of this survey must be kept on site during asbestos abatement activities.



8. Limitations

The field observations, measurements, and research reported herein are considered sufficient in detail and scope to determine the asbestos content of the tested materials at the subject property. The assessment, conclusions, and recommendations presented herein are based upon specifically limited data. They do not represent all conditions at the subject property as they reflect the information gathered for specific building systems. CSC warrants the findings and conclusions contained herein have been promulgated in accordance with generally accepted industrial hygiene methodology and only for the site described in this report.

8.1 Use by Third Parties

This report was prepared pursuant to the contract CSC has with the client. That contractual relationship included an exchange of information about the subject property that was unique and between CSC and its client and serves as the basis upon which this report was prepared. Because of the importance of the communication between CSC and its client, reliance or any use of this report by anyone other than the client, for whom it was prepared, is prohibited and therefore not foreseeable to CSC.

Reliance or use by any such third party without explicit authorization in the report does not make said third party a third party beneficiary to CSC's contract with the client. Any such unauthorized reliance on or use of this report, including any of its information or conclusions, will be at third party's risk. For the same reasons, no warranties or representations, expressed or implied in this report, are made to any such third party.

8.2 Unidentifiable Conditions

This asbestos related environmental consulting report has been developed to provide the client with information regarding apparent conditions related to limited accessible building materials in the subject property. Although CSC believes that the findings and conclusions provided in this report are reasonable, the assessment is necessarily limited to the conditions observed and to the information available at the time of the work. Due to the nature of the work, there is a possibility conditions exist that could not be identified within the scope of the assessment or which were not apparent at the time of our site work. The assessment is also limited to information available from the client at the time it was conducted. It is also possible that the testing methods employed at the time of the report may later be superseded by other methods. CSC does not accept responsibility for changes in the state of the art.

Clark Seif Clark, Inc. does not guarantee that all contaminated areas in the subject property were recognized during our evaluation. This report is limited only to the samples taken and locations sampled. Additional sampling may be needed to further identify other pollutants, or other affected areas inside the property.

We have employed state-of-the-art practices to perform this analysis of risk and identification, but this evaluation is limited in scope to the areas listed above. Our services consist of professional opinions and recommendations made in accordance with generally accepted engineering principles and practices, and are designed to provide an analytical tool to assist the client.



Limited Asbestos Survey Sun Chief Mill Site - Trailer Southeast Corner of Highways 70 & 77, Globe, AZ CSC Project Number 5002357

Clark Seif Clark or those representing Clark Seif Clark bear no responsibility for the actual condition of the structure or safety of a site pertaining to IAQ contamination regardless of the actions taken by the client.

Thank you for choosing Clark Seif Clark, Inc. to provide professional consulting services. If for some reason you have any questions regarding this report, please do not hesitate to contact us.

Thank you, Clark Seif Clark, Inc.

Written by,

Robert E. Crawley, CIEC

AHERA Building Inspector E2412,

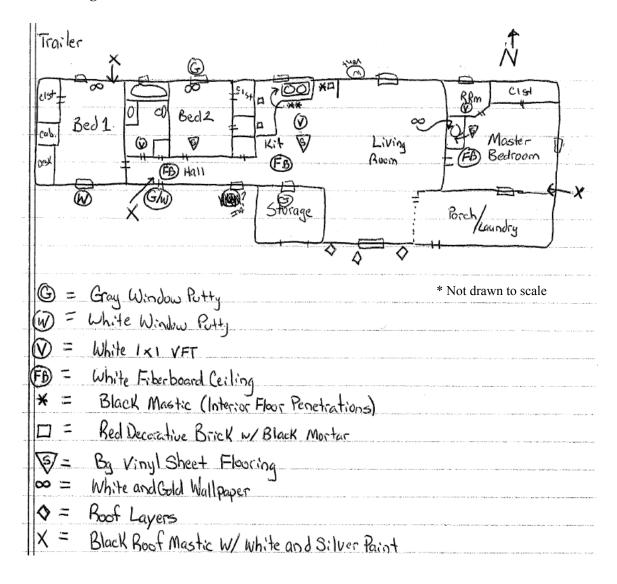
Expires April, 2010

Reviewed and Approved by,

Paul V. Anderson, MS, CIEC AHERA Building Inspector E2951

Expires June, 2010

9. Site Diagram



10. Site Photos





Photo 7: Example of 1'x1' VFT – negative for ACM



Photo 8: Example of bulk sample collection of the kitchen VFT and vinyl sheet flooring



Asbestos Bulk Sampling Chain of Custody

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Asbestos Bulk Sampling Chain of Custody

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Asbestos Bulk Sample Analysis Summary

[Performed by EPA 600/R-93/116 Method]

Project Site: Sun Chief Mill

Globe, AZ

CSC Project / Lab #: 99005289

#Samples: 51

Sampling By: Robert Crawley

Date Sampled: 1/26/2010 - 1/27/2010

Page: 1 of 5

Date Received: 2/2/2010

Client Name: Weston Solutions, Inc. (5000786)

Barbara Wethington

Department: Project Manager

Suite 201

960 West Elliot Road Tempe, AZ 85284 Paris Carral L. 1/00/00/10

Date Reported: 2/11/2010 CSC Job Ref. ID: 5002357

Client ID#	Lab Sample#	Material Description	Location	Asbestos Type & %	Fibrous Non-Asbestos	Nonfibrous Non- Asbestos
2357 B-1	5289-1	Vinyl Sheet Flooring Beige	Trailer - Master Bedroom	ND	ND	100% Matrix Material
2357 B- 1A	5289-2	Felt Backing Green	Trailer - Master Bedroom	ND	95% Glass Fibers, Cellulose, Synthetic	5% Matrix Material
2357 B- 1B	5289-3	Flooring Adhesive Yellow	Trailer - Master Bedroom	ND	2% Cellulose	98% Matrix Materia
2357 B-2	5289-4	Vinyl Sheet Flooring Beige	Trailer - Kitchen	ND	ND	100% Matrix Material
2357 B- 2A	5289-5	Felt Backing Green	Trailer - Kitchen	ND	95% Glass Fibers, Cellulose, Synthetic	5% Matrix Material
2357 B- 2B	5289-6	Flooring Adhesive Yellow	Trailer - Kitchen	ND	3% Cellulose	97% Matrix Materia
2357 B-3	5289-7	Vinyl Sheet Flooring Beige	Trailer - Bedroom 2	ND	ND	100% Matrix Material
2357 B- 3A	5289-8	Felt Backing Green	Trailer - Bedroom 2	ND	95% Glass Fibers, Cellulose, Synthetic	5% Matrix Material
2357 B- 3B	5289-9	Flooring Adhesive Yellow	Trailer - Bedroom 2	ND	2% Cellulose	98% Matrix Material
2357 B-4	5289-10	1x1 VFT White	Trailer - Master Bath	ND	ND	100% Matrix Material

CSC Project / Lab #: 99005289

Address: Globe, AZ

Client ID#	Lab Sample #	Material Description	Location	Asbestos Type & %	Fibrous Non-Asbestos	Nonfibrous Non- Asbestos
2357 B- 4A	5289-11	Flooring Mastic (adhesive) Yellow	Trailer - Master Bath	ND	ND	100% Matrix Material
2357 B-5	5289-12	1x1 VFT White	Trailer - Kitchen	, ND	ND	100% Matrix Material
2357 B- 5A	5289-13	Flooring Mastic (adhesive) Yellow	Trailer - Kitchen	ND	ND	100% Matrix Material
2357 B-6	5289-14	1x1 VFT White	Trailer - Hall Bath	ND	ND	100% Matrix Material
2357 B- 6A	5289-15	Flooring Mastic (adhesive) Yellow	Trailer - Hall Bath	ND	ND	100% Matrix Material
2357 B-7	5289-16	Fiberboard Ceiling Brown	Trailer - Master Bedroom	ND	100% Cellulose	0% Matrix Material
2357 B- 7A	5289-17	Texture Coat White	Trailer - Master Bedroom	ND	ND	100% Matrix Material
2357 B-8	5289-18	Fiberboard Ceiling Brown	Trailer - Kitchen	ND	100% Cellulose	0% Matrix Material
2357 B- 8A	5289-19	Texture Coat White	Trailer - Kitchen	ND	ND	100% Matrix Material
2357 B-9	5289-20	Fiberboard Ceiling Brown	Trailer - Hallway	ND	100% Cellulose	0% Matrix Material
2357 B- 9A	5289-21	Texture Coat White	Trailer - Hallway	ND	ND	100% Matrix Material
2357 B-10	5289-22	Wallpaper White & Gold	Trailer - Master Bedroom	ND	ND	100% Matrix Material
2357 B-11	5289-23	Wallpaper White & Gold	Trailer - Bedroom 1	ND	ND	100% Matrix Material
2357 B-12	5289-24	Wallpaper White & Gold	Trailer - Bedroom 2	ND	ND	100% Matrix Material

CSC Project / Lab #: 99005289

Address: Globe, AZ

Client ID#	Lab Sample#	Material Description	Location	Asbestos Type & %	Fibrous Non-Asbestos	Nonfibrous Non- Asbestos
2357 B-13	5289-25	Penetration Mastic Black	Trailer - Kitchen Floor, NE	5% Chrysotile	3% Cellulose	92% Matrix Materia
2357 B-14	5289-26	Penetration Mastic Black	Trailer - Kitchen Floor, N Center	6% Chrysotile	4% Cellulose	90% Matrix Materia
2357 B-15	5289-27	Penetration Mastic Black	Trailer - Kitchen Floor, N Center	7% Chrysotile	4% Cellulose	89% Matrix Materia
2357 B-16	5289-28	Brick Red	Trailer - Kitchen	ND	2% Cellulose	98% Matrix Material
2357 B- 16A	5289-29	Mortar Black	Trailer - Kitchen	ND	ND	100% Matrix Material
2357 B-17	5289-30	Brick Red	Trailer - Kitchen	ND	1% Cellulose	99% Matrix Material
2357 B- 17A	5289-31	Mortar Black	Trailer - Kitchen	ND	ND	100% Matrix Material
2357 B-18	5289-32	Brick Red	Trailer - Kitchen	ND	2% Cellulose	98% Matrix Material
2357 B- 18A	5289-33	Mortar Black	Trailer - Kitchen	ND	ND	100% Matrix Material
2357 B-19	5289-34	Window Putty White	Trailer - N Vent	2% Chrysotile	ND	98% Matrix Material
2357 B-20	5289-35	Window Putty White	Trailer - Bed 1, S Window	3% Chrysotile	ND	97% Matrix Material
2357 B-21	5289-36	Window Putty White	Trailer - SW Door	2% Chrysotile	ND	98% Matrix Material
2357 B-22	5289-37	Putty Gray	Trailer - SW Door	30% Chrysotile	ND	70% Matrix Material
2357 B-23	5289-38	Putty Gray	Trailer - Bedroom 2	30% Chrysotile	ND	70% Matrix Material

CSC Project / Lab #: 99005289

Address: Globe, AZ

Client ID#	Lab Sample #	Material Description	Location	Asbestos Type & %	Fibrous Non-Asbestos	Nonfibrous Non- Asbestos
2357 B-24		Putty Gray	Trailer - Kitchen, S Window	35% Chrysotile	ND	65% Matrix Material
2357 B-25	5289-40	Roof Mastic (tar) Black	Trailer - S	ND	8% Cellulose	92% Matrix Material
2357 B- 25A	5289-41	Paint Silver & White	Trailer - S	10% Chrysotile	ND	90% Matrix Material
2357 B-26	5289-42	Roof Mastic (tar) Black	Trailer - E	ND	6% Cellulose	94% Matrix Material
2357 B- 26A	5289-43	Paint Silver & White	Trailer - E	10% Chrysotile	ND	90% Matrix Material
2357 B-27	5289-44	Roof Mastic (tar) Black	Trailer - N	ND ND	5% Cellulose	95% Matrix Material
2357 B- 27A	5289-45	Paint Silver & White	Trailer - N	12% Chrysotile	ND	88% Matrix Material
2357 B-28	5289-46	Pebbled Roofing Layer Black	Trailer - S. Roof	ND	70% Cellulose, Synthetic	30% Matrix Material
2357 B- 28A	5289-47	Roofing Layer Black	Trailer - S. Roof	ND	75% Cellulose, Synthetic	25% Matrix Material
2357 B-29	5289-48	Pebbled Roofing Layer Black	Trailer - S. Roof	ND	70% Cellulose, Synthetic	30% Matrix Material
2357 B- 29A	5289-49	Roofing Layer Black	Trailer - S. Roof	ND.	75% Cellulose, Synthetic	25% Matrix Material
2357 B-30	5289-50	Pebbled Roofing Layer Black	Trailer - S. Roof	ND	70% Cellulose, Synthetic	30% Matrix Material
2357 B- 30A	5289-51	Roofing Layer Black	Trailer - S. Roof	ND	75% Cellulose, Synthetic	25% Matrix Material

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CSC Project / Lab #: 99005289

Address: Globe, AZ

Lab
Client ID # Sample # Material Description

Location

Asbestos
Type & %

Fibrous Non-Asbestos Nonfibrous Non-Asbestos

Bulk Material Analysis:

Bulk samples are examined by Polarized Light Microscopy (PLM) with Dispersion Staining as recommended by the U.S. Environmental Protection Agency (EPA).

Results

Results are reported as a percent(%) of total asbestos present for each asbestos type identified within each distinguishable layer, or sub-sample, of a sample. Other non-asbestos materials may also be identified.

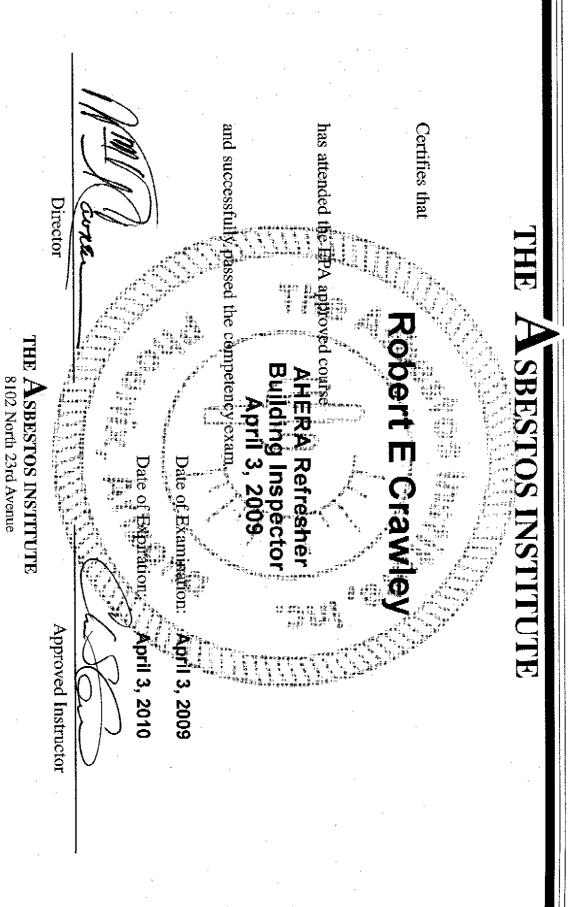
Explanation

Reported results are a visual estimate by area of asbestos concentration. Results for heterogeneous samples examined by component are reported as a composite. The lower limit of reliable detection for the PLM methods is 1%. Samples which contain asbestos in a concentration lower than the limit of reliable detection (<1%) commonly referred to as "trace" are reported as "<1%". Trace is defined as reproducible detection levels of asbestos with at least five fibers spread over three slides, per NIST Proficiency Test instructions. Samples in which no asbestos is observed are reported as ND (None Detected). Note: When ND appears on a report, it means that asbestos was not observed and that, if present, it exists in concentrations of <1% and/or fiber dimensions are too small for accurate microscopic resolution. CSCL is accredited by the National Voluntary Laboratory Accreditation Program for the specific scope of accreditation under NVLAP Lab Code 200324. Results reported relate only to sample(s) submitted and tested and do not necessarily apply to other apparently identical or similar materials. This report is submitted for the exclusive use of the client to whom it is addressed. Any reproduction of this report or use of this Laboratory's name for advertising or publicity purposes without prior written authorization is prohibited. In addition, this report is not to be used to claim product endorsement by NVLAP or any agency of the U.S. Government.

elay Egper Laboratory Analyst

Christian Goerrissen
Laboratory Analyst/Manager

Note: Our policy is to dispose of samples unless written notification is received in our office within 30 days of this report.



This training meets all requirements for asbestos accreditation under TSCA Title II.

Phoenix, AZ 85021-4962

Suite A

602-864-6564